

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
Sikeith J. Walker	:	
	:	Bankruptcy No: 19-13519-amc
Debtor.	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtor, by his attorney, Erik B. Jensen, Esquire, hereby submits the following Motion to Modify Plan After Confirmation, and in support hereof states as follows:

1. The Debtor filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code on May 31, 2019.
2. The Debtor's First Amended Chapter 13 Plan was filed on September 6, 2019.
3. The Debtor's Second Amended Chapter 13 Plan was filed on November 6, 2019.
4. The Debtor's Second Amended Plan provided for monthly payments in the amount of \$600.00 per month for seven (7) months, then \$840.00 per month starting in month thirteen (13) for 48 months for a total base amount of \$47,520.00.
5. The Debtor's Second Amended Plan was confirmed on December 18, 2019.
6. To date the Debtor has paid \$8,400.60 into the Plan.
7. The Debtor was injured and suffered a broken arm causing him to lose his employment with EZ Trans Enterprises.
8. Due to the Covid-19 Global Medical Health Emergency, the Debtor is unable to obtain employment which has caused the Debtor to suffer economic hardship and has caused the Debtor to fall behind on his monthly payment to the Chapter 13 Trustee.
9. Due to his economic hardship, the Debtor proposes to modify the plan to extend the plan period from 60 months to 84 months pursuant to the CARES ACT. See Exhibit "A". a

copy of the Debtor's proposed modified plan (the "Proposed Modified Plan") attached for the Court's convenience.

10. Under the Proposed Modified Plan, the Debtor will pay a base amount of \$47,472.00.

11. Neither the Chapter 13 Trustee nor the Debtor's creditors will be prejudiced by the Proposed Modified Plan.

12. The Proposed Modified Plan is feasible and in the best interest of the Debtor.

WHEREFORE, the Debtor respectfully requests that the Motion to Modify Plan After Confirmation be granted.

Date: January 13, 2021

Respectfully submitted,

/s/ Erik B. Jensen
Erik B. Jensen, Esquire
Jensen Bagnato, P.C.
1500 Walnut Street, Suite 1510
Philadelphia, PA 19102
(215) 546-4700/Fax: (215) 546-7440
erik@jensenbagnatolaw.com